

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LUSTIG,
Aka George

Defendant.

Case No. 13CR3921-BEN

INFORMATION
(superseding)

Title 18, U.S.C., §1952(a)(3) – Travel in
Aid of Racketeering

The United States Attorney charges:

Count 1

On or about October 15, 2011, within the Southern District of California, and elsewhere defendant **MICHAEL LUSTIG** used a facility of interstate and foreign commerce, namely a cell phone, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a prostitution offense under the laws of the United States (18 U.S.C. §1591), and thereafter performed an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity; all in violation of Title 18, U.S.C. §1952(a)(3).

Count 2

On or about November 11, 2011, within the Southern District of California, and elsewhere defendant **MICHAEL LUSTIG** used a facility of interstate and foreign commerce, namely a cell phone, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a prostitution offense under the laws of the United States (18 U.S.C. §1591), and thereafter performed an act to promote, manage, establish and carry on, and


1 to facilitate the promotion, management, establishment and carrying on of such unlawful
2 activity; all in violation of Title 18, U.S.C. §1952(a)(3).

3 Count 3

4 On or about June 8, 2012, within the Southern District of California, and
5 elsewhere defendant **MICHAEL LUSTIG** used a facility of interstate and foreign
6 commerce, namely a cell phone, with the intent to promote, manage, establish, carry on
7 and facilitate the promotion, management, establishment and carrying on of an unlawful
8 activity, that is, a prostitution offense under the laws of the United States (18 U.S.C.
9 §1591), and thereafter performed an act to promote, manage, establish and carry on, and
10 to facilitate the promotion, management, establishment and carrying on of such unlawful
11 activity; all in violation of Title 18, U.S.C. §1952(a)(3).

12
13
14 Dated: July 31, 2014

LAURA E. DUFFY
United States Attorney

15
16
17 
ALESSANDRA P. SERANO
Assistant U.S. Attorney
18
19
20
21
22
23
24
25
26
27
28